

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-20360-CR-SCOLA

UNITED STATES OF AMERICA,
Plaintiff,

v.

JAVIER LAZO-CABRERA,
Defendant.

_____ /

OBJECTION TO PRE-SENTENCE INVESTIGATION REPORT

The Defendant, JAVIER LAZO-CABRERA (“Lazo-Cabrera”) by and through the undersigned counsel, files these Objection to the Pre-Sentence Investigation Report (“PSI”) and hereby states his objection to the Department of Probation’s Pre-Sentence Investigation Report as follows:

Lazo-Cabrera objects to paragraph 57, which states that “*he is responsible for a loss totaling \$5,634,026. Because the loss amount is more than \$3,500,000 but not more than \$9,500,000, the offense level is increased by 18 levels.*” However, the loss amount should be consistent with his plea agreement entered on December 21, 2023, which reflects the loss amount to be more than \$1,500,00.00 but no more than \$3,500,00.00, resulting in a 16-level increase, not 18 levels as indicated in the PSI.

WHEREFORE, the Defendant, JAVIER LAZO-CABRERA, respectfully requests that this Honorable Court grant his Objection to Pre-Sentence Investigation Report and impose a sentence in accordance herewith.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was furnished electronically to **Joseph Egozi, Esq., AUSA, Office of the United States Attorney** this 15th day of February 2024.

By: s/Michael Mirer
MICHAEL MIRER, ESQ.